

**ENTERED**

January 06, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

BRAZOS ELECTRIC POWER  
COOPERATIVE, INC.,

Debtor.<sup>1</sup>

Chapter 11

Case No. 21-30725 (DRJ)

BRAZOS ELECTRIC POWER  
COOPERATIVE, INC.,

Plaintiff,

v.

507 Capital LLC; 507 Summit LLC; Cetus  
Capital VI, L.P.; Chase Lincoln First  
Commercial Corporation; Citigroup Financial  
Products Inc.; CrossingBridge Low Duration  
High Yield Fund; Destinations Global Fixed  
Income Opportunities Fund; Destinations Low  
Duration Fixed Income Fund; Koch Energy  
Services LLC; Leaffilter North Holdings, Inc.;  
NJR Energy Services Co.; OFM II, LP; OU 2  
LLC; RiverPark Short Term High Yield;  
RiverPark Strategic Income Fund; Total Gas  
& Power North America, Inc.; and Two Seas  
Global (Master) Fund LP,

Defendants.

Adv. Proc. No. 21-04407(DRJ)

(Docket No. 27)

**STIPULATION AND AGREED ORDER SETTING SCHEDULE FOR RESPONDING  
TO THE DEBTOR'S COMPLAINT**

**WHEREAS**, on November 22, 2021, Brazos Electric Power Cooperative, Inc. ("Brazos Electric") or the "Debtor") filed its omnibus objection and complaint (the "Complaint") objecting to the amounts and classification of the proofs of claim filed by 507 Capital LLC (216); 507

<sup>1</sup> The Debtor in this Chapter 11 case, along with the last four digits of its federal tax identification number is Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor's claims and noticing agent at <http://cases.stretto.com/Brazos>. The Debtor's address is 7616 Bagby Avenue, Waco, TX 76712.

Summit LLC (106); Cetus Capital VI, L.P. (113, 110, 214); Chase Lincoln First Commercial Corporation (335); Citigroup Financial Products Inc. (385); CrossingBridge Low Duration High Yield Fund (115, 207); Destinations Global Fixed Income Opportunities Fund (213); Destinations Low Duration Fixed Income Fund (114, 208); Koch Energy Services LLC (“Koch”) (319); Leaffilter North Holdings, Inc. (110, 210); NJR Energy Services Company (“NJRES”) (167); OFM II, LP (108, 110, 114, 115, 215); OU 2 LLC (211); RiverPark Short Term High Yield (113, 206); RiverPark Strategic Income Fund (212); Total Gas & Power North America, Inc. (“Total”) (350); and Two Seas Global (Master) Fund LP (106) (collectively the “Gas Claimants”).<sup>2</sup>

**WHEREAS**, counsel for the Debtor and the Gas Claimants wish to set a schedule for responding to the Complaint and briefing any motions that may be filed in response to the Complaint;

**NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND ORDERED:**

1. Counsel for each of the respective Gas Claimants agrees to accept service of the Complaint and related summons via email.
2. The Gas Claimants’ responses to the Complaint shall be filed and served via e-mail on or before January 7, 2022.
3. The Debtor’s response to any motions filed by the Gas Claimants in response to the Complaint shall be filed and served via e-mail by February 7, 2022.
4. Any related reply briefs shall be filed and served via e-mail by March 2, 2022.
5. This Stipulation and Agreed Order is immediately effective upon entry by the Court.

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<sup>2</sup> Numbers in the parentheses denote the claim number in the Debtor’s official Claims Register.

6. Neither this Stipulation and Agreed Order nor any of its terms may be modified, altered, amended or waived, except in writing signed by the Parties hereto and approved by the Court.

7. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation and Agreed Order, and the undersigned parties (on behalf of their respective clients) hereby consent to such jurisdiction solely for the purpose of resolving any disputes or controversies arising from or related to this Stipulation and Agreed Order.

**IT IS SO ORDERED**

**Signed: January 05, 2022.**



DAVID R. JONES  
UNITED STATES BANKRUPTCY JUDGE

**AGREED TO BY:**

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